BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS FRONK TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE (POSTCOM/USPS-T33-1)

The United States Postal Service hereby provides the response of witness Fronk to the following interrogatory of the Association for Postal Commerce: POSTCOM/ USPS-T33-1, filed on March 8, 2000. The interrogatory was originally designated by PostCom as "T25-1," but corrected to "T33-1" in a notice filed on March 10, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

Shall

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 March 22, 2000

RESPONSE OF US POSTAL SERVICE WITNESS FRONK TO INTERROGATORIES OF THE ASSOCIATION FOR POSTAL COMMERCE

PostCom/USPS-T-33-1. Please refer to lines 12-14 on page 36 of your testimony, where you state: "The Postal Service proposes creating three tiers by disaggregating the 3/5-digit combined rate into a 3-digit rate and a 5-digit rate." Please describe all reasons why you are proposing to disaggregate the 3/5-digit combined rate into a 3-digit rate and a 5-digit rate.

RESPONSE: My reasons for this proposed change appear in my testimony in the section concerning Automation Flats. Please see USPS-T-33 at pages 36-38 generally, and specifically page 36, lines 16-18 and page 38, lines 3-11.

DECLARATION

I, David R. Fronk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

David N. Fronk

Dated: 3-22-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

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